

---

**Eckhart v. Fox News Network, LLC -- Revised List**

---

**Eden Quainton** <equainton@gmail.com>

Mon, Sep 30, 2024 at 9:27 AM

To: "Michael J. Willemin" &lt;mwillemin@wigdorlaw.com&gt;

Cc: "McKenna, Kathleen M." &lt;KMckenna@proskauer.com&gt;, "Hollreiser, Julia F." &lt;JHollreiser@proskauer.com&gt;

Sorry, I'm not talking about describing them as "nude," but in more detail. Is it your position that any description of the photos does not need to be sealed? I want to make sure I understand your position.

Thanks,

Eden

On Mon, Sep 30, 2024 at 9:17 AM Michael J. Willemin <mwillemin@wigdorlaw.com> wrote:

Anything that is marked confidential and is not on the public record should be sealed. I am reasonably certain that the fact that some of the photos were nude is on the public record, and describing them as such is not an issue.

**Michael J. Willemin**

Partner

212 257 6800

85 Fifth Avenue

New York, NY 10003

[wigdorlaw.com](http://wigdorlaw.com)

This communication may contain Confidential or Attorney-Client Privileged Information and/or Attorney Work Product. If you are not the addressee indicated in this message or its intended recipient (or responsible for delivery of the message to such person(s)), do not read, copy, or forward this message to anyone and, in such case, please immediately destroy or delete this message, including any copies hereof, and kindly notify the sender by reply e-mail or phone. Thank you.

---

**From:** Eden Quainton <equainton@gmail.com>**Sent:** Monday, September 30, 2024 9:13:45 AM**To:** Michael J. Willemin <mwillemin@wigdorlaw.com>**Cc:** McKenna, Kathleen M. <KMckenna@proskauer.com>; Hollreiser, Julia F. <JHollreiser@proskauer.com>**Subject:** Re: Eckhart v. Fox News Network, LLC -- Revised List

Just to be clear: the omitted portions of messages in the public record do not need to be sealed?

If a photo has been described in general terms in the record (i.e., a photo of Jennifer in lingerie) is it your position that a more detailed description of the photo needs to be sealed?

On Mon, Sep 30, 2024 at 9:03 AM Michael J. Willemin <mwillemin@wigdorlaw.com> wrote:

I think they were described in the motion to dismiss papers and decision so whatever is already on the public record is fine. Any messages in the public record can be described or quoted from no problem.

Michael J. Willemin  
Partner

212 257 6800  
85 Fifth Avenue  
New York, NY 10003

[wigdorlaw.com](http://wigdorlaw.com)



This communication may contain Confidential or Attorney-Client Privileged Information and/or Attorney Work Product. If you are not the addressee indicated in this message or its intended recipient (or responsible for delivery of the message to such person(s)), do not read, copy, or forward this message to anyone and, in such case, please immediately destroy or delete this message, including any copies hereof, and kindly notify the sender by reply e-mail or phone. Thank you.

---

**From:** Eden Quainton <[equainton@gmail.com](mailto:equainton@gmail.com)>  
**Sent:** Monday, September 30, 2024 8:58:51 AM  
**To:** Michael J. Willemin <[mwillemin@wigdorlaw.com](mailto:mwillemin@wigdorlaw.com)>  
**Cc:** McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>; Hollreiser, Julia F. <[JHollreiser@proskauer.com](mailto:JHollreiser@proskauer.com)>  
**Subject:** Re: Eckhart v. Fox News Network, LLC -- Revised List

What about verbal descriptions of the photos? Is it your position any such descriptions should be redacted?

I assume you are not taking that position with respect to messages you have explicitly put at issue (#obey, #discipline)?

On Mon, Sep 30, 2024 at 7:47 AM Michael J. Willemin <[mwillemin@wigdorlaw.com](mailto:mwillemin@wigdorlaw.com)> wrote:

Eden, I haven't had a chance to review all of these documents over the weekend. Please file under seal anything that was marked confidential in this action, and any photos our client sent to Mr. Henry and/ that he took of her.

Michael J. Willemin  
Partner

212 257 6800  
85 Fifth Avenue  
New York, NY 10003

[wigdorlaw.com](http://wigdorlaw.com)



This communication may contain Confidential or Attorney-Client Privileged Information and/or Attorney Work Product. If you are not the addressee indicated in this message or its intended recipient (or responsible for delivery of the message to such person(s)), do not read, copy, or forward this message to anyone and, in such case, please immediately destroy or delete this message, including any copies hereof, and kindly notify the sender by reply e-mail or phone. Thank you.

---

**From:** Eden Quainton <[equainton@gmail.com](mailto:equainton@gmail.com)>  
**Sent:** Friday, September 27, 2024 1:49:07 PM  
**To:** Michael J. Willemin <[mwillemin@wigdorlaw.com](mailto:mwillemin@wigdorlaw.com)>

**Cc:** McKenna, Kathleen M. <[KMckenna@proskauer.com](mailto:KMckenna@proskauer.com)>; Hollreiser, Julia F. <[JHollreiser@proskauer.com](mailto:JHollreiser@proskauer.com)>

**Subject:** Eckhart v. Fox News Networks, LLC - Revised List  
[Case 1:20-cv-05593-RA-GWG](#) [Document 438-68](#) [Filed 12/09/24](#) [Page 3 of 5](#)

Michael: The revised list is below. I have removed the Fox documents because they are already part of the record. Also could you please send me the designations for Jennifer Eckhart's deposition as soon as possible. Thank you,

HENRY\_\_00000001  
HENRY\_\_00000002  
HENRY\_\_00000003  
HENRY\_\_00000004  
HENRY\_\_00000005  
HENRY\_\_00000849  
HENRY\_\_00000851  
HENRY\_\_00000852  
HENRY\_\_00000855  
HENRY\_\_00000858  
HENRY\_\_00000010  
HENRY\_\_00000011  
HENRY\_\_00000012  
HENRY\_\_00000013  
HENRY\_\_00000014  
HENRY\_\_00000015  
HENRY\_\_00000017  
HENRY\_\_00000018  
HENRY\_\_00000019  
HENRY\_\_00000020  
HENRY\_\_00000021  
HENRY\_\_00000022  
PL\_\_H0000798  
PL\_\_H000822  
PL\_\_H000824  
PL\_\_H000825  
PL\_\_H002745  
PL\_\_H002746  
PL\_\_H002747  
PL\_\_H002748  
PL\_\_H002750  
PL\_\_H002834  
PL\_\_H002846  
PL\_\_H002849  
PL\_\_H002852  
PL\_\_H002853  
PL\_\_H002859  
PL\_\_H002861  
PL\_\_H002865  
PL\_\_H002866  
PL\_\_H002871  
PL\_\_H002872  
PL\_\_H002877  
PL\_\_H002906  
PL\_\_H002907  
PL\_\_H002908  
PL\_\_H002911  
PL\_\_H002912

PL\_\_H002915  
PL\_\_H002952  
PL\_\_H002955  
PL\_\_H002956  
PL\_\_H002957  
PL\_\_H002958  
PL\_\_H002963  
PL\_\_H002964  
PL\_\_H002965  
PL\_\_H002995  
PL\_\_H002996

--

Eden P. Quainton  
Quainton Law, PLLC  
2 Park Avenue, 20th Floor  
New York, NY 10016  
Tel: 212.419.0575  
Fax: 212.376.5699.  
Cell: 202.360.6296

245 Nassau St.  
Princeton, NJ 08540  
Tel: 609-356-0526  
Cell: 202-360-6296  
<https://quaintonlaw.net>

--

Eden P. Quainton  
Quainton Law, PLLC  
2 Park Avenue, 20th Floor  
New York, NY 10016  
Tel: 212.419.0575  
Fax: 212.376.5699.  
Cell: 202.360.6296

245 Nassau St.  
Princeton, NJ 08540  
Tel: 609-356-0526  
Cell: 202-360-6296  
<https://quaintonlaw.net>

--

Eden P. Quainton  
Quainton Law, PLLC  
2 Park Avenue, 20th Floor  
New York, NY 10016  
Tel: 212.419.0575  
Fax: 212.376.5699.  
Cell: 202.360.6296

245 Nassau St.  
Princeton, NJ 08540  
Tel: 609-356-0526  
Cell: 202-360-6296  
<https://quaintonlaw.net>

--

Eden P. Quainton  
Quainton Law, PLLC  
2 Park Avenue, 20th Floor  
New York, NY 10016  
Tel: 212.419.0575  
Fax: 212.376.5699.  
Cell: 202.360.6296

245 Nassau St.  
Princeton, NJ 08540  
Tel: 609-356-0526  
Cell: 202-360-6296  
<https://quaintonlaw.net>